

July 17, 2006

Dale Swain

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

I am writing you today in regards to the proposed Business Opportunity Rule (R511993). While I do support legislation that will curb unethical and unfair practices, I do not want to see a rule that will hinder in any way those that are "doing it right".

I have been an independent associate of USANA Health Sciences for over 6 years. This is my livelihood and I take great pride in conducting business with integrity. Most of your proposed legislation is troubling to me because you would tarnish my reputation without cause. I believe I am the type of individual you would want to protect because I represent all that is right with this industry.

7-Day Waiting Period

A prime example of would be the 7-day waiting period. This automatically puts up a red-flag and puts us in a negative light. It is also unnecessary because the company I represent, USANA Health Sciences, has a 30-day, no questions asked, money back guarantee. This policy alone protects the consumer and projects confidence that we are legitimate and that we do what we say we are going to do.

Litigation Reporting

I also find it unfair that litigation reporting does not distinguish between winning and losing lawsuits. This means any one could sue and do damage to the company even if the reason for the lawsuit is unfounded. The public deserves to know about bad companies, but not at the expense of reputable companies.

USANA Health Sciences and its associates have worked diligently to protect our good name and have always taken great pride in doing things right. Punishing good companies like us is counterproductive.

Distributor References

I also have concerns over providing distributor references. With the concern over identity theft, most people would be very uncomfortable with providing personal information, including myself.

And what if a person has just started and does not have 10 distributors? How could they satisfy this rule?

This rule would also create more of an opportunity for people with ulterior motives to collect personal information of others.

In Closing

I appreciate the intention of the FTC with this proposal. I realize there are fraudulent groups out there that should be exposed and punished. All I ask is to not lump us all together. Don't punish, hinder, or damage those that build their businesses with integrity and represent what is good about this industry.

Thank you for your time and consideration in this important matter.

Regards,

Dale Swain